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U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

SLT:TAD/PEN/AHT  
F.# 2009R01065/OCDETF# NY-NYE-616

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

– against –

JOAQUIN ARCHIVALDO GUZMAN LOERA,  
also known as “El Chapo,” “El  
Rapido,” “Chapo Guzman,”  
“Shorty,” “El Senor,” “El  
Jefe,” “Nana,” “Apa,” “Papa,”  
“Inge” and “El Viejo,” and  
ISMAEL ZAMBADA GARCIA,  
also known as “El Mayo,” “Mayo  
Zambada,” “Doctor,” “La Doc,”  
“Doctora,” “El Lic,” “Mike”  
and “Mayo El Senor,”

Defendants.

----- X

THE GRAND JURY CHARGES:

SUPERSEDING  
INDICTMENT

Cr. No. 09-466(SLT)(S-1)  
(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(A)(i),  
841(b)(1)(A)(ii)(II), 846,  
848(a), 848(b), 848(c),  
853(a), 853(p), 959(a),  
959(c), 960(a)(1), 960(a)(3),  
960(b)(1)(A), 960(b)(1)(B)(ii)  
960(b)(1)(G), 960(b)(1)(H),  
and 963;  
T. 18, U.S.C., §§ 2,  
924(c)(1)(A)(i),  
924(c)(1)(A)(ii),  
924(c)(1)(A)(iii), 924(c)(1)(B)(ii),  
924(d), 1956(h), 3238 and 3551  
et seq.)

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

1. Since the late 1980s, the Mexican Federation, also known as the  
“Federation,” “La Federacion,” the “Sinaloa Cartel” and the “Alliance,” existed as an  
organized crime syndicate founded upon longstanding relationships between Mexico’s major  
drug trafficking kingpins. The Federation functioned as a council with representatives from

the respective drug trafficking organizations of its principal leaders, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as "El Chapo," "El Rapido," "Chapo Guzman," "Shorty," "El Senor," "El Jefe," "Nana," "Apa," "Papa," "Inge" and "El Viejo," and ISMAEL ZAMBADA GARCIA, also known as "El Mayo," "Mayo Zambada," "Doctor," "La Doc," "Doctora," "El Lic," "Mike" and "Mayo El Senor," and others. In the early 2000s, conflicts developed between drug trafficking kingpins within the Federation and the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA. A series of internal wars occurred, and the Federation dissolved. The defendants' faction of the Federation became known as the Sinaloa Cartel, which was the largest drug trafficking organization in the world. The vast majority of drugs trafficked by the Sinaloa Cartel were imported into United States, where the drugs were consumed. The Sinaloa Cartel's drug sales in the United States generated billions of dollars in profit. The drug proceeds were then laundered back to Mexico; often the drug money was physically transported from the United States to Mexico in vehicles containing hidden compartments and through other clandestine means.

2. The Sinaloa Cartel operated through cooperative arrangements and close coordination with South American cocaine sources of supply. Through a network of corrupt police and political contacts, the Federation directed a large scale narcotics transportation network involving the use of land, air and sea transportation assets, shipping multi-ton quantities of cocaine from South America, through Central America and Mexico, and finally into the United States. In addition, the Sinaloa Cartel manufactured and imported multi-ton

quantities of heroin, methamphetamine and marijuana into the United States. While at times there have been rifts and infighting among the leaders of the Sinaloa Cartel, they generally coordinated their criminal activities, shared and controlled Mexico's trafficking routes, resolved conflicts over territory, minimized inter-organization violence and ensured their common political and judicial protection.

3. The defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA also employed "sicarios," or hitmen, who carried out hundreds of acts of violence, including murders, assaults, kidnappings, assassinations and acts of torture at the direction of the defendants. The defendants directed and ordered these acts of violence for a variety of reasons, including but not limited to:

- a. Promoting and enhancing the prestige, reputation and position of the Sinaloa Cartel with respect to rival criminal organizations;
- b. Preserving and protecting the power, territory and criminal ventures of the Sinaloa Cartel, including but not limited to the Sinaloa Cartel's control over drug trafficking routes over the U.S.-Mexico border;
- c. Dissuading Mexican law enforcement officers, members of the Mexican military and other public officials in Mexico from enforcing Mexican drug laws and disrupting the Sinaloa Cartel's activities;
- d. Enforcing discipline amongst its members and associates by punishing disloyalty and failure; and

e. Protecting members of the Sinaloa Cartel from arrest and prosecution by silencing potential witnesses and retaliating against anyone who provided information or assistance to law enforcement authorities.

COUNT ONE  
(Continuing Criminal Enterprise)

4. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

5. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally engage in a continuing criminal enterprise, in that the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA committed violations of Title 21, United States Code, Sections 841(a), 846, 848(e), 952(a), 959(a), 960(a) and 963, including Violations One through One Hundred Ninety-Five set forth below, which violations were part of a continuing series of violations of those statutes undertaken by the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, in concert with five or more other persons, with respect to whom the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA

GARCIA occupied supervisory and management positions, and were each one of several principal administrators, organizers and leaders of the continuing criminal enterprise, and from which continuing series of violations the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA obtained substantial income and resources, and which enterprise received in excess of \$10 million in gross receipts during one or more twelve-month periods for the manufacture, importation and distribution of cocaine. The violations involved at least 300 times the quantity of a substance described in Section 841(b)(1)(B) of Title 21, United States Code, to wit: 150 kilograms or more of a substance containing cocaine. The continuing series of violations, as defined by Title 21, United States Code, Section 848(c), includes the following violations set forth below:

Violations One Through One Hundred Sixty-Three  
(International Cocaine Distribution –  
Approximately 457,212 Kilograms of Cocaine)

6. On or about the dates listed below, all dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offenses involved a substance containing cocaine, a Schedule II controlled substance, in the amounts listed below, contrary to Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii), and Title 18, United States Code, Section 2:

<b>VIOLATION NUMBER</b>	<b>APPROXIMATE AMOUNT OF COCAINE</b>	<b>DATE(S) OF OFFENSE</b>
1	3,082 Kilograms	February 2014
2	373 Kilograms	January 15, 2014
3	434 Kilograms	June 6, 2013
4	1,560 Kilograms	May 2, 2010
5	1,000 Kilograms	October 7, 2009
6	5,000 Kilograms	December 29, 2008
7	450 Kilograms	December 2008
8	5,000 Kilograms	September 13, 2008
9	5,000 Kilograms	September 9-12, 2008
10	3,900 Kilograms	July 15, 2008
11	7,000 Kilograms	June 16, 2008
12	3,600 Kilograms	May 10, 2008
13	4,800 Kilograms	December 2007
14	2,132 Kilograms	November 11, 2007
15	23,000 Kilograms	October 2007
16	1,810 Kilograms	September 28, 2007
17	1,810 Kilograms	August 16, 2007
18	1,810 Kilograms	July 28, 2007
19	1,810 Kilograms	July 8, 2007

20	1,810 Kilograms	June 16, 2007
21	1,810 Kilograms	May 27, 2007
22	1,810 Kilograms	May 14, 2007
23	640 Kilograms	April 30, 2007
24	4,336 Kilograms	April 15, 2007
25	19,000 Kilograms	March 18, 2007
26	1,870 Kilograms	January 15, 2007
27	2,000 Kilograms	January 2007
28	9,000 Kilograms	January 2007 – December 2007
29	7,000 Kilograms	January 2007 – December 2007
30	500 Kilograms	December 2006
31	500 Kilograms	December 2006
32	3,000 Kilograms	November 12, 2006
33	1,420 Kilograms	November 12, 2006
34	2,100 Kilograms	November 10, 2006
35	800 Kilograms	October 20, 2006
36	500 Kilograms	October 11, 2006
37	6,000 Kilograms	September 23, 2006
38	3,000 Kilograms	September 19, 2006
39	1,000 Kilograms	August 29, 2006

40	392 Kilograms	August 29, 2006
41	4,140 Kilograms	August 28, 2006
42	1,108 Kilograms	August 28, 2006
43	2,100 Kilograms	July 18, 2006
44	291 Kilograms	July 10, 2006
45	1,291 Kilograms	July 10, 2006
46	2,463 Kilograms	July 8, 2006
47	1,465 Kilograms	May 21, 2006
48	2,800 Kilograms	May 7, 2006
49	1,095 Kilograms	May 5, 2006
50	3,048 Kilograms	April 9, 2006
51	2,100 Kilograms	April 4, 2006
52	818 Kilograms	April 4, 2006
53	1,000 Kilograms	April 4, 2006
54	900 Kilograms	March 24, 2006
55	340 Kilograms	March 10, 2006
56	2,120 Kilograms	February 11, 2006
57	2,800 Kilograms	February 7, 2006
58	400 Kilograms	February 3, 2006
59	4,467 Kilograms	January 13, 2006



60	1,567 Kilograms	January 11, 2006
61	811 Kilograms	November 30, 2005
62	1,750 Kilograms	November 5, 2005
63	2,000 Kilograms	November 2005
64	1,200 Kilograms	October 27, 2005
65	1,500 Kilograms	September 30, 2005
66	2,000 Kilograms	August 26, 2005
67	2,040 Kilograms	August 23, 2005
68	1,902 Kilograms	July 28, 2005
69	1,300 Kilograms	July 27, 2005
70	3,971 Kilograms	July 23, 2005
71	1,700 Kilograms	July 11, 2005
72	1,100 Kilograms	July 9, 2005
73	3,120 Kilograms	July 8, 2005
74	4,000 Kilograms	July 6, 2005
75	1,500 Kilograms	June 10, 2005
76	1,811 Kilograms	June 2, 2005
77	2,500 Kilograms	May 24, 2005
78	4,127 Kilograms	April 4, 2005
79	1,300 Kilograms	April 2005

80	2,000 Kilograms	March 16, 2005
81	3,980 Kilograms	March 11, 2005
82	2,000 Kilograms	February 12, 2005
83	1,840 Kilograms	January 27, 2005
84	3,200 Kilograms	January 2005 – February 2005
85	3,063 Kilograms	December 2004 – January 2005
86	1,850 Kilograms	December 22, 2004
87	1,589 Kilograms	December 20, 2004
88	1,562 Kilograms	December 18, 2004
89	2,000 Kilograms	December 14, 2004
90	1,850 Kilograms	November 11, 2004
91	1,500 Kilograms	November 8, 2004
92	1,800 Kilograms	October 31, 2004
93	1,000 Kilograms	October 30, 2004
94	2,000 Kilograms	October 22, 2004
95	1,246 Kilograms	October 22, 2004
96	616 Kilograms	October 11, 2004
97	500 Kilograms	September 25, 2004
98	1,000 Kilograms	September 25, 2004
99	900 Kilograms	September 18, 2004

100	1,830 Kilograms	September 13, 2004
101	2,745 Kilograms	August 11, 2004
102	1,997 Kilograms	August 31, 2004
103	1,662 Kilograms	August 18, 2004
104	1,500 Kilograms	August 11, 2004
105	12,000 Kilograms	September 4, 2004
106	10,500 Kilograms	September 4, 2004
107	1,888 Kilograms	July 29, 2004
108	1,000 Kilograms	July 1, 2004
109	10,000 Kilograms	July 2004
110	1,000 Kilograms	June 15, 2004
111	548 Kilograms	June 4, 2004
112	1,000 Kilograms	June 3, 2004
113	1,000 Kilograms	May 15, 2004
114	1,400 Kilograms	May 5, 2004
115	10,000 Kilograms	May 2004 – June 2004
116	800 Kilograms	April 2004
117	14,000 Kilograms	April 2004 – December 2004
118	12,000 Kilograms	March 24, 2004
119	2,000 Kilograms	March 20, 2004

120	1,000 Kilograms	March 14, 2004
121	10,000 Kilograms	March 2004 – April 2004
122	6,000 Kilograms	March 2004 – April 2004
123	1,620 Kilograms	February 23, 2004
124	1,620 Kilograms	February 6, 2004
125	8,000 Kilograms	January 2004 – February 2004
126	1,999 Kilograms	January 25, 2004
127	1,632 Kilograms	January 24, 2004
128	1,956 Kilograms	January 21, 2004
129	6,465 Kilograms	January 2004
130	1,752 Kilograms	December 31, 2003
131	1,455 Kilograms	December 30, 2003
132	1,624 Kilograms	December 16, 2003
133	1,424 Kilograms	December 9, 2003
134	1,800 Kilograms	December 7, 2003
135	1,561 Kilograms	December 1, 2003
136	1,638 Kilograms	November 8, 2003
137	550 Kilograms	November 4, 2003
138	6,000 Kilograms	November 2003 – December 2003
139	619 Kilograms	October 20, 2003

140	776 Kilograms	October 14, 2003
141	234 Kilograms	October 4, 2003
142	3,600 Kilograms	August 2003 – September 2003
143	265 Kilograms	August 13, 2003
144	2,000 Kilograms	August 8, 2003
145	700 Kilograms	July 26, 2003
146	1,860 Kilograms	July 16, 2003
147	300 Kilograms	June 26, 2003
148	288 Kilograms	June 19, 2003
149	1,300 Kilograms	June 12, 2003
150	300 Kilograms	June 10, 2003
151	300 Kilograms	May 31, 2003
152	1,817 Kilograms	May 31, 2003
153	1,282 Kilograms	May 25, 2003
154	2,200 Kilograms	May 14, 2003
155	1,200 Kilograms	May 14, 2003
156	415 Kilograms	April 21, 2003
157	1,237 Kilograms	April 10, 2003
158	460 Kilograms	April 7, 2003
159	600 Kilograms	April 5, 2003

160	1,500 Kilograms	April 2003
161	1,703 Kilograms	February 17, 2003
162	1,500 Kilograms	January 15, 2003
163	999 Kilograms	January 6, 2003

Violations One Hundred Sixty-Four Through One Hundred Seventy-One  
(Cocaine Distribution – Approximately 8,009 Kilograms of Cocaine)

7. On or about the dates listed below, all dates being approximate and inclusive, within the Districts listed below, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offenses involved a substance containing cocaine, a Schedule II controlled substance, in the amounts listed below, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II), and Title 18, United States Code, Section 2:

<b>VIOLATION NUMBER</b>	<b>JURISDICTION</b>	<b>APPROXIMATE AMOUNT OF COCAINE</b>	<b>DATE(S) OF OFFENSES</b>
164	District of Arizona	30 Kilograms	September 27, 2013
165	Middle District of Pennsylvania	200 Kilograms	January 10, 2006
166	District of New Jersey	509 Kilograms	September 4, 2004
167	Eastern District of New York	2,000 Kilograms	January 28, 2003
168	Northern District of Illinois	1,733 Kilograms	August 16, 2002

169	Eastern District of New York	1,937 Kilograms	May 24, 2002
170	Eastern District of New York	500 Kilograms	November 14, 2000
171	Western District of Texas	1,100 Kilograms	September 15, 1999

Violation One Hundred Seventy-Two  
(Heroin Distribution)

8. On or about September 4, 2004, within the District of New Jersey, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved one kilogram or more of a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

Violation One Hundred Seventy-Three  
(International Methamphetamine Manufacture and Distribution)

9. In or about and between January 2008 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, did knowingly and intentionally manufacture and distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved 500 grams or more of substance containing methamphetamine, a Schedule II controlled substance,

contrary to Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(H), and Title 18, United States Code, Section 2.

Violation One Hundred Seventy-Four  
(International Marijuana Manufacture and Distribution)

10. In or about and between January 2008 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, did knowingly and intentionally manufacture and distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved 1,000 kilograms or more of substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(G), and Title 18, United States Code, Section 2.

Violation One Hundred Seventy-Five  
(Murder Conspiracy –  
Informants and Cooperating Witnesses)

11. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally conspire to kill and



cause the intentional killing of one or more persons, to wit: individuals who agreed to become informants or cooperating witnesses for law enforcement, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Seventy-Six  
(Murder Conspiracy – Murder of Mexican Law Enforcement and  
Military Personnel and Public Officials)

12. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally conspire to kill and cause the intentional killing of one or more persons, to wit: members of Mexican law enforcement and military personnel and Mexican public officials, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Seventy-Seven  
(Murder Conspiracy –  
Members of the Beltran-Leyva Organization)

13. In or about and between January 2008 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes

charged in Counts Two through Four, did knowingly and intentionally conspire to kill and cause the intentional killing of one or more persons, to wit: members of the Beltran-Leyva drug trafficking organization, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Seventy-Eight  
(Murder Conspiracy –  
Members of the Carillo-Fuentes Organization)

14. In or about and between September 2004 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally conspire to kill and cause the intentional killing of one or more persons, to wit: members of the Carillo-Fuentes drug trafficking organization, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Seventy-Nine  
(Murder Conspiracy – Members of the Zetas Organization)

15. In or about and between January 2001 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under

Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally conspire to kill and cause the intentional killing of one or more persons, to wit: members of Los Zetas drug trafficking organization, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Eighty  
(Murder Conspiracy –  
Members of the Arellano-Felix Organization)

16. In or about and between January 1990 and December 2011, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally conspire to kill and cause the intentional killing of one or more persons, to wit: members of the Arellano-Felix drug trafficking organization, and such killings did result, contrary to Title 21, United States Code, Sections 848(e)(1)(A) and 846.

Violation One Hundred Eighty-One  
(Attempted Murder of Arturo Beltran-Leyva)

17. In or about October 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses

punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally attempt to kill and cause the intentional killing of Arturo Beltran-Leyva, in violation of Title 21, United States Code, Sections 848(e)(1)(A) and 846, and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Two  
(Attempted Murder of John Doe #1)

18. In or about October 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally attempt to kill and cause the intentional killing of John Doe #1, an individual whose identity is known to the grand jury, in violation of Title 21, United States Code, Sections 848(e)(1)(A) and 846, and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Three  
(Murder of Rafael Ramirez-Jaimes)

19. In or about August 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and

cause the intentional killing of Rafael Ramirez-Jaimes, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Four  
(Murder of Raul LNU)

20. In or about May 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of Raul LNU, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Five  
(Murder of Secretaria de Seguridad Publica Officer  
Roberto Velasco-Bravo)

21. In or about April 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of Secretaria de Seguridad Publica Officer Roberto Velasco-

Bravo, a Mexican law enforcement agent, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Six  
(Attempted Murder of John Doe #2)

22. In or about and between June 2006 and December 2006, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally attempt to kill and cause the intentional killing of John Doe #2, an individual whose identity is known to the grand jury, in violation of Title 21, United States Code, Sections 848(e)(1)(A) and 846, and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Seven  
(Murder of Julio Beltran)

23. On or about July 13, 2005, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and

cause the intentional killing of Julio Beltran, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Eight  
(Murder of John Doe #3)

24. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #3, an individual whose identity is known to the grand jury, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Eighty-Nine  
(Murder of John Doe #4)

25. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #4, an individual whose identity is known to the grand jury, in violation of

Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety  
(Murder of John Doe #5)

26. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #5, an individual whose identity is known to the grand jury, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety-One  
(Murder of John Doe #6)

27. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #6, an individual whose identity is known to the grand jury, in



violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety-Two  
(Murder of John Doe #7)

28. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #7, an individual whose identity is known to the grand jury, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety-Three  
(Murder of John Doe #8)

29. In or about and between January 2005 and June 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of John Doe #8, an individual whose identity is known to the grand jury, in

violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety-Four  
(Murder of Rodolfo Carillo-Fuentes)

30. On or about September 11, 2004, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the intentional killing of Rodolfo Carillo-Fuentes, in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

Violation One Hundred Ninety-Five  
(Murder of FNU LNU, also known as "Robachivas")

31. In or about and between January 2000 and June 2000, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA GARCIA, together with others, while engaged in one or more offenses punishable under Sections 841(b)(1)(A) and 960(b)(1) of Title 21 of the United States Code, to wit: the crimes charged in Counts Two through Four, did knowingly and intentionally kill and cause the

intentional killing of FNU LNU, also known as "Robachivas," in violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.

(Title 21, United States Code, Sections 848(a), 848(b) and 848(c); Title 18, United States Code, Sections 3238 and 3551 et seq.)

COUNT TWO

(International Cocaine, Heroin, Methamphetamine and  
Marijuana Manufacture and Distribution Conspiracy)

32. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

33. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as "El Chapo," "El Rapido," "Chapo Guzman," "Shorty," "El Senor," "El Jefe," "Nana," "Apa," "Papa," "Inge" and "El Viejo," and ISMAEL ZAMBADA GARCIA, also known as "El Mayo," "Mayo Zambada," "Doctor," "La Doc," "Doctora," "El Lic," "Mike" and "Mayo El Senor," together with others, did knowingly and intentionally conspire to manufacture and distribute one or more controlled substances, which offense involved: (a) a substance containing cocaine, a Schedule II controlled substance; (b) a substance containing heroin, a Schedule I controlled substance; (c) a substance containing methamphetamine, a Schedule II controlled substance; and (d) a substance containing marijuana, a Schedule I controlled substance, intending and knowing that such substances would be unlawfully imported into the United States from a place outside thereof, contrary to Title 21, United States Code, Section 959(a). The amount of

cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least five kilograms or more of a substance containing cocaine. The amount of heroin involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least one kilogram or more of a substance containing heroin. The amount of methamphetamine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least 500 grams or more of a mixture or substance containing methamphetamine. The amount of marijuana involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least one thousand kilograms of a substance containing marijuana.

(Title 21, United States Code, Sections 959(c), 960(a)(3), 960(b)(1)(A), 960(b)(1)(B)(ii), 960(b)(1)(G), 960(b)(1)(H) and 963; Title 18, United States Code, Sections 3238 and 3551 et seq.)

**COUNT THREE**  
(Cocaine Importation Conspiracy)

34. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

35. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 952(a). The amount of cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least five kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 960(a)(1), 960(b)(1)(B)(ii) and 963; Title 18, United States Code, Sections 3551 et seq.)

#### COUNT FOUR

##### (Cocaine Distribution Conspiracy)

36. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

37. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo

Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was at least five kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

#### COUNT FIVE

(International Distribution of Cocaine –  
Approximately 3,082 Kilograms of Cocaine)

38. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

39. In or about February 2014, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United

States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT SIX

(International Distribution of Cocaine –  
Approximately 373 Kilograms of Cocaine)

40. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

41. On or about January 15, 2014, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT SEVEN

(Cocaine Distribution –  
Approximately 30 Kilograms of Cocaine)

42. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

43. On or about September 27, 2013, within the District of Arizona, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT

(International Distribution of Cocaine –  
Approximately 434 Kilograms of Cocaine)

44. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

45. On or about June 6, 2013, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,”



“Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT NINE

(International Distribution of Cocaine –  
Approximately 1,560 Kilograms of Cocaine)

46. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

47. On or about May 2, 2010, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United

States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT TEN

(International Distribution of Cocaine –  
Approximately 1,000 Kilograms of Cocaine)

48. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

49. On or about October 7, 2009, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT ELEVEN

(International Distribution of Cocaine –  
Approximately 450 Kilograms of Cocaine)

50. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

51. In or about December 2008, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT TWELVE

(International Distribution of Cocaine –  
Approximately 640 Kilograms of Cocaine)

52. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

53. On or about April 30, 2007, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as

“El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

#### COUNT THIRTEEN

(International Distribution of Cocaine –  
Approximately 400 Kilograms of Cocaine)

54. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

55. On or about February 3, 2006, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the

United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT FOURTEEN

(International Distribution of Cocaine –  
Approximately 3,200 Kilograms of Cocaine)

56. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

57. In or about and between January 2005 and February 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT FIFTEEN

(International Distribution of Cocaine –  
Approximately 12,000 Kilograms of Cocaine)

58. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

59. In or about September 2004, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT SIXTEEN

(International Distribution of Cocaine –  
Approximately 10,500 Kilograms of Cocaine)

60. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

61. In or about September 2004, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as

“El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT SEVENTEEN  
(International Distribution of Cocaine –  
Approximately 6,000 Kilograms of Cocaine)

62. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

63. In or about and between March 2004 and April 2004, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place

outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT EIGHTEEN

(International Distribution of Cocaine –  
Approximately 1,999 Kilograms of Cocaine)

64. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

65. On or about January 25, 2004, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)



COUNT NINETEEN

(International Distribution of Cocaine –  
Approximately 1,500 Kilograms of Cocaine)

66. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

67. In or about April 2003, within the extraterritorial jurisdiction of the United States, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

COUNT TWENTY

(Use of Firearms)

68. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

69. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more drug trafficking crimes, to wit: the crimes charged in Counts One through Nineteen, and did knowingly and intentionally possess such firearms in furtherance of said drug trafficking crimes, one or more of which firearms was brandished and discharged and one or more of which firearms was a machinegun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2 and 3551 et seq.)

COUNT TWENTY-ONE  
(Conspiracy to Launder Narcotics Proceeds)

70. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

71. In or about and between January 1989 and September 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,” “Nana,” “Apa,” “Papa,” “Inge” and “El Viejo,” and ISMAEL ZAMBADA GARCIA, also known as “El Mayo,” “Mayo Zambada,” “Doctor,” “La Doc,” “Doctora,” “El Lic,” “Mike” and “Mayo El Senor,” together

with others, did knowingly and intentionally conspire to: (i) conduct one or more financial transactions in and affecting interstate and foreign commerce, to wit: the transfer and delivery of United States currency, which transactions in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, contrary to Title 21, United States Code, Sections 841(a)(1), 846, 848, 952(a), 959 and 963, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, (a) with the intent to promote the carrying on of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the funds represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and (ii) transport, transmit and transfer monetary instruments and funds from a place in the United States to and through one or more places outside the United States, to wit: Mexico and Colombia, (a) with the intent to promote the carrying on of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(2)(A), and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(ii).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE  
(Continuing Criminal Enterprise)

72. The United States hereby gives notice to the defendants that, upon conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, and any of their interest in, claims against, and property or contractual rights affording a source of control over, the continuing criminal enterprise, including but not limited to at least approximately a sum of money equal to \$14 billion in United States currency.

73. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable

property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

**CRIMINAL FORFEITURE ALLEGATION**  
**AS TO COUNTS TWO THROUGH NINETEEN**  
(Cocaine, Heroin, Methamphetamine and/or Marijuana Trafficking)

74. The United States hereby gives notice to the defendants that, upon conviction of any of the offenses charged in Counts Two through Nineteen, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses including but not limited to at least approximately a sum of \$14 billion in United States currency.

75. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable

property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

**CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWENTY**  
(Use of Firearms in Furtherance of Drug Trafficking)

76. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Twenty, the government will seek forfeiture in accordance with Title 21, United States Code, Section 924(d), which requires any person convicted of such offense to forfeit any firearm or ammunition involved in or used in any knowing violation of such offense.

77. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(p) and 924(d))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWENTY-ONE  
(Money Laundering)

78. The United States hereby gives notice to the defendants that, upon conviction of the offense charged in Count Twenty-One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of all property involved in such offense, and all property traceable to such property, including but not limited to at least approximately a sum of \$14 billion in United States currency.

79. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;


it is the intent of the United States, pursuant to Title 18, United States Code, Section 982, to

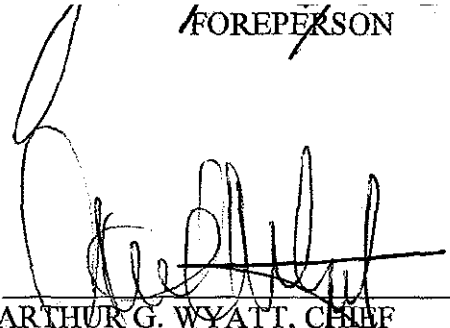
seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982)

A TRUE BILL

~~FOREPERSON~~

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

  
ARTHUR G. WYATT, CHIEF  
NARCOTICS & DANGEROUS DRUG  
SECTION, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE



FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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## UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK  
CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

JOAQUIN ARCHIVALDO GUZMAN LOERA and ISMAEL ZAMBADA  
GARCIA,

Defendants.

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### INDICTMENT

( T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II), 846,  
848(a), 848(b), 848(c), 853(a), 853(p), 959(a), 959(c), 960(a)(1), 960(a)(3),  
960(b)(1)(A), 960(b)(1)(B)(ii), 960(b)(1)(G), 960(b)(1)(H) and 963; T. 18,  
U.S.C., §§ 2, 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii),  
924(c)(1)(B)(ii), 924(d), 1956(h), 3238 and 3551 et seq.)

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

*Kenji M. Price, Assistant U.S. Attorney (718) 254-6059*